

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: §
FRONTIER HOTELS, INC., § **CASE NO. 16-34477**
DEBTOR § **(CHAPTER 11)**

**NOTICE OF ISSUANCE OF
DOCUMENT SUBPOENA TO FRONTIER HOTELS, INC., DEBTOR**

American First National Bank (“AFNB”) Serves this Notice of Issuance of the attached document Subpoena for service upon the Debtor, Frontier Hotels, Inc.

Date: January 17, 2017

Respectfully submitted,

By: /s/ John Akard Jr.
JOHN AKARD JR.
TBA #00790212
COPLEN & BANKS, PC
11111 McCracken, Suite A
Cypress, TX 77429
832-237-8600
832-202-2088 (fax)
ATTORNEYS FOR AMERICAN FIRST NATIONAL
BANK

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on each of the persons listed on the attached service list and the entities listed below by ECF filing or United States first class mail on January 17, 2017.

Debtor:

Frontier Hotels, Inc.
11230 Southwest Freeway
Houston, TX 77031
VIA EXPRESS MAIL

Debtor's Purported New Counsel:

Azhar Mahmood Chaudhary
1208 Highway 6 South, Suite B
Sugar Land, TX 77478
attorney@chaudharyjd.com

Former Debtor's Counsel:

James B. Jameson
PO Box 980575
Houston, TX 77098
bjjameson@jamesonlaw.net

US Trustee:

Stephen Statham
Office of the US Trustee
515 Rusk Ave, Ste 3516
Houston, TX 77002
stephen.statham@usdoj.gov

Parties Requesting Notice:

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Linebarger Goggan Blair & Sampson
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houston_bankruptcy@publicans.com
Attorneys for Harris County

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1235 North Loop West, Suite 600
Houston, TX 77008
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Attorneys for Alief Independent School District, City
of Houston and International Management District

Jason A. Starks
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Bankruptcy & Collections Division
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Attorneys for Choice Hotels International, Inc.

Howard Marc Spector
Spector & Johnson, PLLC
12770 Coit Road, Suite 1100
Dallas, Texas 75251
hmspector@spectorjohnson.com
Attorneys for Propel Financial Services, LLC; Propel
Funding National 1,LLC and PFS Tax Lien Trust
2014-1

Parties Filing Proofs of Claim

Harris County
Represented by Counsel

City of Houston
Represented by Counsel

Alief ISD
Represented by Counsel

International Management District
Represented by Counsel

Internal Revenue Service
P.O. Box 7346
Philadelphia PA 19101-7346

Toyota Motor Credit
c/o LynAlise K. Tannery
14841 Dallas Parkway, Suite 300
Dallas TX 75254
BkeyAttorneys@BuckleyMadole.com

Paramount Catastrophe Services
c/o Marc Lance Ellison
2211 Norfolk, Suite 510
Houston, TX 77098
mellison@tetlegal.com

By: /s/ John Akard Jr. _____

UNITED STATES BANKRUPTCY COURT

Southern

District of Texas

In re Frontier Hotels, Inc.

Debtor

(Complete if issued in an adversary proceeding)

Case No. 16-34477

Plaintiff

V.

Defendant

Adv. Proc. No.

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT
INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)**

To: Frontier Hotels, Inc. and/or its Designated Representative

(Name of person to whom the subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See Exhibit A

PLACE 11111 McCracken, Suite A, Cypress Texas 77429	DATE AND TIME 1/27/17 @ 12:00 noon
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Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

PLACE	DATE AND TIME
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The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 1/18/17

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk


John A. Lewis, Jr.
Attorney's signature

The name, address, email address, and telephone number of the attorney representing (*name of party*) _____, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A

DEFINITIONS

For purposes of this Subpoena, the following list of definitions shall apply and be used in complying with this request:

- a. "Document(s)" means all written, typed, or printed matter and all magnetic or other records or documentation of any kind or description (including, without limitation, letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, bills of lading, agreements, records, or notations of telephone or personal conversations, conferences, interoffice communications, E-mail, microfilm, bulletins, circulars, instant messages, text messages, pamphlets, photographs, facsimiles, invoices, tape recordings, computer printouts and work sheets), including drafts and copies not identical to the originals, all photographs and graphic matter, however produced or reproduced, and all compilations of data from which information can be obtained, and any and all writings, or recordings of any type or nature, in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, consultants, accountants, attorneys, or other agents, whether or not prepared by you. For purposes of this subpoena, "document" should be given the broadest possible definition, including the definition employed under the Federal Rules of Civil Procedure.
- b. "Communication" means any transfer or exchange between two or more persons of any information whether by written or oral means, including, but not limited to, personal conversations, correspondence, telephone call, telegrams, emails, instant messages, and text messages. This definition includes all communications for which you claim privilege.
- c. "Relating to" and "relates to" mean, without limitation, embodying, mentioning, or concerning, directly or indirectly, the subject matter identified in the request for production.
- d. The word "and" means "and/or."
- e. The word "or" means "or/and."
- f. "Frontier," "Frontier Hotel" or "Debtor" shall mean the Debtor, Frontier Hotels, Inc., in Case No. 16-34477 pending in the US Bankruptcy Court, Southern District of Texas, Houston Division, and all divisions, subsidiaries, affiliates, and the predecessors and successors of the same, as well as officers, directors, employees and agents of each of them.
- g. The "Hotel" shall mean the Frontier Inn located at 11230 Southwest Freeway, Houston, Texas.

PRODUCE DOCUMENTS THAT REFLECTS OR CONTAINS:

1. In paper and electronic format, any and all Frontier Hotels bank statements for September 1, 2016 through January 20, 2017.
2. In paper and electronic format, any and all bank activity or transaction reports for January 1, 2017 through January 20, 2017 for Frontier Hotels.
3. In paper and electronic format, any and all point of sales or other room reports or ledgers evidencing occupancy of the Hotel for September 1, 2016 through January 20, 2017.
4. In paper and electronic format, any and all sales or occupancy tax reports from September 1, 2016 through January 20, 2017 for Frontier Hotel.